

FILED

NOV 02 2020

In The United States District Court  
Northern District of Oklahoma

Mark C. McCartt, Clerk  
U.S. DISTRICT COURT

Anthony Scott  
Plaintiff

-vs-

No: CV-20-503-CVE-FHM

Mr. Bobby Lumpkin, And Kenneth Putnam,  
Texas Dept. of Corrections, et al.,  
Dallas County Texas Sheriff, et al.  
State of Texas, et al.,  
Okla., and Unknown, Others, State, et al.  
Defendants.

Seeking 11 Million Dollars And  
Jury Trial

AMENDED

Civil Rights, Americans With Disabilities Act,  
Wrongful Incarceration, Conspiracy Action

Plaintiff, Anthony Scott, 6260 North Xanthus Place, Tulsa, Okla., 74130, brings this action in THIS Court under the Multi-District Jurisdictional , doctrine, AS HE IS STILL Suffering Continuing damages, pain, suffering , economic losses, harm and injuries, that started in Texas, where because of *defendants acts against him, he can not live, therefore is entitled to bring this action in this Court* where he lives and defendants acts in conspiracy with Okla. Employees is causing wrongs.

Defendant One, Texas Department of Corrections, now called Texas Dept. Of Criminal Justice Located at P.O.B. 99, Huntsville, Texas, 77342 ( Director Bobby Lumpkin )' knowingly, willfully and intentionally, kept plaintiff in prison more that 11 months after his lawful release date, as established by the sentencing Court., AND this defendant, in conspiracy with Okla. State employees and other defendants, known and unknown, CAUSED the continuing wrongs plaintiff suffers from today AS IF daily inflicted upon him over and over, in Tulsa, Okla., ONLY possible because of his American Correctional Membership, connections to Okla. And conspiracy with OKLA. State agents.

Defendant two, Kenneth Putnan, of H.H. Coffield Unit, 2661 F.M. 2054, Tenn. Colony, Tx. 75884, IN conspiracy with American Correctional Member DEFENDANT ONE, consulted with Oklahoma State Prison officials, AND Come to Okla. For A.C.A. Inspections of State prisons, and in

Mail — No Cert Svc — No Orig Sign —  
C/J — C/MJ — C/Ret'd — No Env — O/J — O/MJ  
No Cyps —

joint agreement, decided to hold petitioner in Texas Prison 11 months past his discharge date, TO GIVE Okla. Police (See 2010 Tulsa Federal Criminal case against Police Judge Eagan was involved in, AND refused to allow 6 army foot lockers of TEXAS & Okla. Police corruption to be entered as evidence, THAT WOULD have lead to federal convictions IN TULSA, of several defendants in this case ). He acted in conspiracy and under State / Federal laws, as an employee AND OUTSIDE his job duties, as an individual, because plaintiff is BLACK, male and from Eagan's area and In Tulsa Black lives do not matter when it comes to TEXAS associated police/corrections employees).

(NOTE: Defendants STOCK ownership and interest in PRIVATE prisons in Okla., WITH that of the Okla. State Dept. Employees retirement fund, AND Both Texas & Okla. Politician/State employees, AND SOME Okla. Federal Court/Law enforcement employees, IS PART of reason defendants agreed with Okla. State employees to MISTREAT plaintiff, and to keep him illegally incarcerated for 11 months after his lawful discharge date , THAT caused the CONTINUING wrong being inflicted upon plaintiff IN Tulsa today, without Okla. State records and employee assistance, petitioner would NOT have been placed in the Texas prison in the first place, NOR kept there past his discharge date, or be suffering CONTINUING harm, damages and wrongs at this time).

COLLUSION between Texas Law Enforcement and Okla. Law enforcement in this case And Fact plaintiff now lives here, and daily suffers increasing damages In Tulsa, who's jail/Sheriff and Dallas County jail/sheriff work together, warrants SERVING Summons upon all defendants and allowing them to respond and defend against allegations, IF they can.

IN VIOLATION of the T.D.C. Mission statement, (AND American Correctional Association/ Okla. Dept. of Corrections) The Court order transferring plaintiff's custody from Dallas County Sheriff's custody to serve his sentence of SEGREGATION from Society for a number of years, in agreement with Okla. Employees, policy/practices AND Communications, connects defendants to this area.

\*\* This is also a BIVINS action as UNKNOWN co-defendants will be discovered during the



process of litigating this action. \*\*

ALL parties acted under BOTH color of law AND as individuals outside their job duties as individuals. IN A conspiracy with each other and agents of each State.

Defendant Two, The Sheriff & Sheriffs department of Dallas County, Texas, can be served at 1133 North Riverfront Boulevard, Dallas, Texas, 75217.

IN VIOLATION of Federal laws and rights of plaintiff, AND STATE Statutes of Texas and acts under color of law, outside their job duties as individuals through negligence/and intent caused acts.

ALL defendants and their Agents and Co-Conspirators can be served at the Texas State Capitol Bldg., at 1100 Congress Ave., Austin, Tex. 78701.

BECAUSE of the control of all licensed attorneys in Texas by defendants, their agents, or co-conspirators, plaintiff was forced to leave Texas because NO attorney would take this case for fear of losing their license, essentially making them an extension of the state, a controlled conspiracy AS AN OFFICER of the Court, bound by oath to only do as directed to do by the state, and in conspiracy with Okla. State officials and employees and oaths of American Bar association, NATION-WIDE, and as acts ARE continuing in Tulsa at time of filing this action, jurisdiction IS proper in this court.

(Plaintiff IS an untrained Pro se litigant proceeding pro per exercising his Constitutional Right to access to Court FOR redress of grievances, without legal assistance , as in conspiracy Texas and Okla. State Bar association members have agreed TO PROTECT defendants and not take such cases).

#### PRIMARY cause of ACTION

Jurisdiction in this Court is proper because of the multi-jurisdictional districts involved, the scattered defendants addresses, AND FACT Texas claims to be an INDEPENDENT Nation, that joined The Union of States and claims a right to leave that Union when-ever it wants, and Wrongs are continuing IN Okla., (Tulsa) PLACING jurisdiction properly in this Court.

( Suits against independent Nations are properly brought where plaintiff's live).

First cause of action, unlawful imprisonment/incarceration BY defendants of plaintiff in a State

prison eleven (11) months after his lawful discharge date in conspiracy with Okla. Officials/employees.

2<sup>nd</sup>. Cause of action is defendants CAUSED plaintiff mental damages & Post-Traumatic-Stress-Disorder, Caused him to suffer from Stockholm Syndrome, CAUSING HIM TO PLEAD GUILTY when he should not have and in conspiracy with Okla. State employees IS causing harm in Tulsa today.

3<sup>rd</sup>. Defendants violated both plaintiffs Americans With Disabilities Act, and Civil Rights Act , AND violated THEIR CONTRACT STATEHOOD agreements to pass no law not in compliance with FEDERAL LAWS, and 42 U.S.C. )( 1981 that mandates ALL persons in all states have same rights in All other states and in conspiracy Okla. And Texas Refuse to comply with 42 )( 1981.

4<sup>th</sup>. Treatment, and conditions imposed upon plaintiff while in the defendants custody in Texas, and today in Tulsa, violated his COMMON LAW, and International Law rights on treatment of prisoners, endangering his health and well being, resulting in permanent physical damages from being forced to drink water from the POISONED prison state-wide water system, Lack of proper protection, medical treatment, access to the general public and family, jobs for after release , by unlawful, over restrictive CORPORAL punishments on mail, religion, phone access, ALL a form of ex post facto-punishment enhancements NOT authorized in the sentencing Court order, but agreed to in conspiracy between both States employees.

Prison rules and regulations are restricted to ensuring only the safety of the facility, not over reaching to make the Court ordered punishment worse, or to prevent maintaining society contacts for future jobs, family & etc. PROVEN Mission Statement goals of Texas & Okla., THAT reduce prisoner's from returning to prison, WHICH defendants did in this case, and do in Tulsa today.

PRIMARY claim is CONTINUING wrongs IN Tulsa Area caused by defendants and/or their agents, and unknown others.( THAT discussed possibilities of being hailed into court in their respective states, at their regular meetings).

Secondary claim is WRONGFUL incarceration for 11 months, CAUSED by conspiracy

BETWEEN Okla. And Texas employees & defendants.

Defendants have control and possession of documents and records ESTABLISHING each defendants personal acts involved in this case, AND their collective conspiracy, that basic discovery will expand and supplement this complaint sufficient to allow it to proceed to that stage at this time.

#### Material FACTS

Fact: Defendants have no immunity, as;

“ When a State officer acts under a state law in a manner violative of the Federal Constitution, he/she comes into conflict with the Superior authority OF THAT constitution, sand he/she is in that case STRIPPED of his/her official or representative character and is subject in his/her person to the consequences of his/her individual conduct.”

“ The state has NO power to impart to him ANY type of immunity from responsibility TO the Supreme Authority OF the United States. WHENEVER a State Judge acts where he/she DOES NOT have jurisdiction to act, they are warring on the constitution. The Judge is engaged in an act of treason.”

See: Scheuer -v- Rhodes, 94 S. Ct. 1683  
U.S. -vs- Will, 101 S. Ct. 471  
Cohens -v- Virginia, 19 U.S. (6 Wheat) 264  
Cooper -v- Aaron, 78 S. Ct. 1401  
Howlett -v- Rose, 496 U.S. At 371  
Khan -v- State, 93 F. 3d. 1358  
U.S. Const. Art. (6), Cl-(2) mandating State Judges are  
Bound by the laws of the United States.

Additional Jurisdiction is found under 42 U.S.C. )( 1981/1983/1985, and 18 U.S.C. )( 1512 and 42 U.S.C. )( 12101, and others.

Plaintiff reserves the right to correct, add to or amend this action AFTER discovery has been provided him, and seeks \$ 11 million dollars OR whatever A trial jury will award him through a public trial proceeding.

Lost income for 11 months,(That would have been in Tulsa), mental anguish & suffering ; Pain & Suffering; Continuing Post Traumatic Stress Disorder , taking place in Tulsa now, warrant COMPENSATORY DAMAGES.



See: Brief & exhibits FROM defendants own records proving this fact.

Punitive damages SHOULD BE DETERMINED by trial jury in this case, AFTER defendants produce DISCOVERY , and answer complaint.

See: Defendants 'evil motive or intent' of reckless or callous indifference to plaintiffs rights.

Smith -v- Wade, 461 U.S. 30  
Siggers -El -v- Barlow, 433 F. Supp. 2d., 811  
Canell -v- Lightner, 143 F. 3d. 1210/1213  
Robinson -v- Page, 170 F. 3d. 747/748  
Thompson -v- Carter, 284 F. 3d. 411  
Crockroft -v- Kirkland, 548 F. Supp. 2d. 767

BECAUSE this is a continuing wrong case covering many geographical areas, including THIS District where plaintiff is living, THIS IS the proper Court for this continuing wrong action.

Although plaintiff seeks \$ 11 Million Dollars total, HE BELIEVES A Trial Jury should determine actual amounts .

Because of defendants acts and control over all attorneys in Texas & Okla., forcing plaintiff to proceed *pro se* and *pro per*, he intends to AMEND the complaint as soon as defendants respond.

The United States Supreme Court has determined defendants have NO Qualified or any other type of immunity defense, as will be proven in a brief from Harvard Law School , when needed.

The prison litigation Reform act does NOT apply to this case, as acts took place when plaintiff was NOT in lawful custody of defendants, AND ARE CONTINUING at this time and on into the future, in Tulsa, Okla., even though plaintiff is NOT a prisoner.

This case , because of the conspiracy between Okla. And Texas State agents, can not be filed in a Texas Federal Court, BECAUSE while 11 months was in Texas, another more than 15 months (And continuing) wrongs were (and are) in Tulsa, where plaintiff lives.(The only place where relief may be granted BY Civil JURY Trial and Black Wall Street survivors testimony).

In good faith, WHEN defendants are served with summons, they will be given an offer to settle out of court as well, that will be revoked after 60 days if not accepted.

I Verify under penalties of perjury The Above is True. Anthony Scott

Certification of Mailing : copy mailed each defendant shown on first page, WITH Summons  
on 102320.

Respectfully,

Anthony Scott

Anthony Scott, VICTIM,

6260 North Xanthus Pl.

Tulsa, Okla. 74130

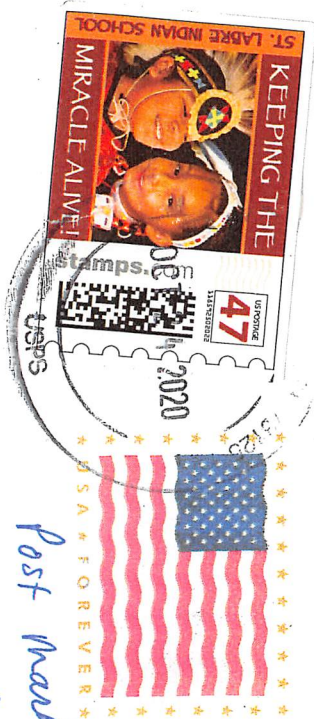
Anthony Scott  
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Tulsa, OK 74130

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Mark C. McCann, Clerk  
U.S. DISTRICT COURT



Post marked

U.S. Dist Court Clerk 10/24/20  
333 W. 4th St  
R. 411

Tulsa, OK 74103